

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:)	CHAPTER 13
)	CASE NO. 23-40650-EDK
JOSEPH P. SHAINÉ,)	
)	
Debtor)	
)	
BARBARA SENNETT,)	
HANS WAGNER, AND)	
J. DOE, <i>a minor child</i> ,)	
)	
Plaintiffs)	
)	
v.)	
JOSEPH P. SHAINÉ,)	ADV. PROCEEDING NO. 23-04030-EDK
)	
Defendant)	
)	

**MOTION TO EXTEND THE DEADLINE TO COMPLY
WITH PRE-TRIAL SCHEDULING ORDER**

To the Honorable Elizabeth D. Katz, U.S. Bankruptcy Judge:

Now come the Plaintiffs, Barbara Sennett, Hans Wagner, and J. Doe,¹ and respectfully move this Honorable Court to grant this Motion to Extend all deadlines in the Court's Scheduling and Pre-Trial Order. The Parties request an extension of approximately one week, or any other time as the Court may deem appropriate.

As reasons therefore, as previously reported, the Parties were previously in settlement negotiations. However, those negotiations have since broken down and the parties have elected to continue with the litigation. The Parties therefore request this extension so that the Court's

¹ J. Doe is a pseudonym. J. Doe is a minor child whose name is therefore redacted pursuant to Fed. R. Bankr. P. 9037.

Scheduling and Pre-Trial Order can be complied with accordingly. Defendant's Counsel, Carl Aframe, Esq., has given his assent to the relief sought herein.

WHEREFORE, the Debtor respectfully requests that this Honorable Court grant this motion.

Respectfully submitted,

The Plaintiffs,
Barbara Sennett,
Hans Wagner, and
J. Doe

By their attorney,

/s/ Richard S. Ravosa
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Dated: February 13, 2024

CERTIFICATE OF SERVICE

I, Richard S. Ravosa, Esq., counsel for the Plaintiffs, Barbara Sennett, Hans Wagner, and J. Doe, hereby certify that on this 13th day of February, 2024, I served the foregoing *Motion to Extend the Deadline* by causing a true copy thereof to be delivered electronically to:

23-04030 Notice will be electronically mailed to:

Carl D. Aframe on behalf of Defendant Joseph P. Shaine
aframe@aframebarnhill.net, connole@aframebarnhill.net; aframe@ecf.courtdrive.net

Matthew M. Hamel on behalf of Plaintiff Barbara Sennett
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Matthew M. Hamel on behalf of Plaintiff Hans Wagner
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Cynthia Ravosa on behalf of Plaintiff Hans Wagner

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Cynthia Ravosa on behalf of Plaintiff J. Doe

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Dated: February 13, 2024

/s/ Richard S. Ravosa

RICHARD S. RAVOSA